

# Exhibit 2

**Eppler, Ian (x2205)**

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**From:** Matthew Nussbaum <mnussbaum@selendygay.com>  
**Sent:** Monday, April 29, 2024 5:21 PM  
**To:** Eppler, Ian (x2205); LoBiondo, George (x2008); Mangi, Adeel A. (x2563); Sandick, Harry (x2723); Long, Julia (x2878); Arrow, Sara (x2031); ~jgreenbaum@sillscummis.com; ~klieb@sillscummis.com; \_cg J&J-SaveOn  
**Cc:** Philippe Selendy; Andrew Dunlap; Meredith Nelson; Elizabeth Snow; Wohlforth, E. Evans; Galli, Sabrina M.  
**Subject:** RE: JJHCS v. SaveOnSP (Case No. 2:22-cv-02632-JKS-CLW)

**External: Think before you click.**

Ian,

As we have previously told you, SaveOn declines to run J&J's proposed "Adapt" search term.

Best,

Matt

**Matthew Nussbaum**

Associate [\[Email\]](#)

Selendy Gay PLLC [\[Web\]](#)

Pronouns: he, him, his

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**From:** Eppler, Ian (x2205) <ieppler@pbwt.com>  
**Sent:** Monday, April 29, 2024 1:25 PM  
**To:** Matthew Nussbaum <mnussbaum@selendygay.com>; LoBiondo, George (x2008) <globiondo@pbwt.com>; Mangi, Adeel A. (x2563) <aamangi@pbwt.com>; Sandick, Harry (x2723) <hsandick@pbwt.com>; Long, Julia (x2878) <jlong@pbwt.com>; Arrow, Sara (x2031) <sarrow@pbwt.com>; ~jgreenbaum@sillscummis.com <jgreenbaum@sillscummis.com>; ~klieb@sillscummis.com <klieb@sillscummis.com>; \_cg J&J-SaveOn <JJSaveOn@pbwt.com>  
**Cc:** Philippe Selendy <pselendy@selendygay.com>; Andrew Dunlap <adunlap@selendygay.com>; Meredith Nelson <mnelson@selendygay.com>; Elizabeth Snow <esnow@selendygay.com>; Wohlforth, E. Evans <EWohlforth@rc.com>; Galli, Sabrina M. <SGalli@rc.com>  
**Subject:** RE: JJHCS v. SaveOnSP (Case No. 2:22-cv-02632-JKS-CLW)

Matt,

We have been discussing this issue in letters and emails since April 12. Given Judge Wolfson's clear order on this issue and the limited burden associated with JJHCS's proposed search term, please confirm by 5 pm today that you will run JJHCS's proposed search term and produce responsive documents. Otherwise, we have no choice but to seek relief from Judge Wolfson.

Best,  
Ian

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**From:** Matthew Nussbaum <[mnussbaum@selendygay.com](mailto:mnussbaum@selendygay.com)>  
**Sent:** Friday, April 26, 2024 2:39 PM  
**To:** LoBiondo, George (x2008) <[globiondo@pbwt.com](mailto:globiondo@pbwt.com)>; Mangi, Adeel A. (x2563) <[aamangi@pbwt.com](mailto:aamangi@pbwt.com)>; Sandick, Harry (x2723) <[hsandick@pbwt.com](mailto:hsandick@pbwt.com)>; Long, Julia (x2878) <[jlong@pbwt.com](mailto:jlong@pbwt.com)>; Arrow, Sara (x2031) <[sarrow@pbwt.com](mailto:sarrow@pbwt.com)>; [jgreenbaum@sillscummis.com](mailto:jgreenbaum@sillscummis.com) <[jgreenbaum@sillscummis.com](mailto:jgreenbaum@sillscummis.com)>; [klieb@sillscummis.com](mailto:klieb@sillscummis.com) <[klieb@sillscummis.com](mailto:klieb@sillscummis.com)>; \_cg J&J-SaveOn <[JJSaveOn@pbwt.com](mailto:JJSaveOn@pbwt.com)>  
**Cc:** Philippe Selendy <[pselendy@selendygay.com](mailto:pselendy@selendygay.com)>; Andrew Dunlap <[adunlap@selendygay.com](mailto:adunlap@selendygay.com)>; Meredith Nelson <[mnelson@selendygay.com](mailto:mnelson@selendygay.com)>; Elizabeth Snow <[esnow@selendygay.com](mailto:esnow@selendygay.com)>; Wohlforth, E. Evans <[EWohlforth@rc.com](mailto:EWohlforth@rc.com)>; Galli, Sabrina M. <[SGalli@rc.com](mailto:SGalli@rc.com)>  
**Subject:** RE: JJHCS v. SaveOnSP (Case No. 2:22-cv-02632-JKS-CLW)

**External: Think before you click.**

George,

We do not have a record of J&J previously requesting hit counts for J&J's proposed "Adapt" search term. That term would require SaveOn to review 3,627 additional documents.

We are available to meet and confer.

Thank you,

Matt

**Matthew Nussbaum**

Associate [\[Email\]](#)

Selendy Gay PLLC [\[Web\]](#)

Pronouns: he, him, his

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**From:** LoBiondo, George (x2008) <[globiondo@pbwt.com](mailto:globiondo@pbwt.com)>  
**Sent:** Friday, April 26, 2024 10:00 AM  
**To:** Matthew Nussbaum <[mnussbaum@selendygay.com](mailto:mnussbaum@selendygay.com)>; Mangi, Adeel A. (x2563) <[aamangi@pbwt.com](mailto:aamangi@pbwt.com)>; Sandick, Harry (x2723) <[hsandick@pbwt.com](mailto:hsandick@pbwt.com)>; Long, Julia (x2878) <[jlong@pbwt.com](mailto:jlong@pbwt.com)>; Arrow, Sara (x2031) <[sarrow@pbwt.com](mailto:sarrow@pbwt.com)>; [jgreenbaum@sillscummis.com](mailto:jgreenbaum@sillscummis.com) <[jgreenbaum@sillscummis.com](mailto:jgreenbaum@sillscummis.com)>; [klieb@sillscummis.com](mailto:klieb@sillscummis.com) <[klieb@sillscummis.com](mailto:klieb@sillscummis.com)>; \_cg J&J-SaveOn <[JJSaveOn@pbwt.com](mailto:JJSaveOn@pbwt.com)>  
**Cc:** Philippe Selendy <[pselendy@selendygay.com](mailto:pselendy@selendygay.com)>; Andrew Dunlap <[adunlap@selendygay.com](mailto:adunlap@selendygay.com)>; Meredith Nelson <[mnelson@selendygay.com](mailto:mnelson@selendygay.com)>; Elizabeth Snow <[esnow@selendygay.com](mailto:esnow@selendygay.com)>; Wohlforth, E. Evans <[EWohlforth@rc.com](mailto:EWohlforth@rc.com)>; Galli, Sabrina M. <[SGalli@rc.com](mailto:SGalli@rc.com)>  
**Subject:** RE: JJHCS v. SaveOnSP (Case No. 2:22-cv-02632-JKS-CLW)

Matt,

Meredith's email below said, "We are running the term that you proposed and will respond once we have the results." Please provide those results without further gamesmanship or delay. See Apr. 3, 2024 Tr. at 59:8–11

(SaveOnSP's counsel: "The problem we have is that we proposed a term, they said no. They didn't give us hit counts justifying or explaining the burden or the volume of documents that that search term would propose."); *id.* at 65:15–17 ("[W]e really do think that when we make proposals, they should be giving us hit counts.")

Thanks,  
George

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**From:** Matthew Nussbaum <[mnussbaum@selendygay.com](mailto:mnussbaum@selendygay.com)>

**Sent:** Friday, April 26, 2024 9:14 AM

**To:** LoBiondo, George (x2008) <[globiondo@pbwt.com](mailto:globiondo@pbwt.com)>; Mangi, Adeel A. (x2563) <[aamangi@pbwt.com](mailto:aamangi@pbwt.com)>; Sandick, Harry (x2723) <[hsandick@pbwt.com](mailto:hsandick@pbwt.com)>; Long, Julia (x2878) <[jlong@pbwt.com](mailto:jlong@pbwt.com)>; Arrow, Sara (x2031) <[sarrow@pbwt.com](mailto:sarrow@pbwt.com)>; [jgreenbaum@sillscummis.com](mailto:jgreenbaum@sillscummis.com) <[jgreenbaum@sillscummis.com](mailto:jgreenbaum@sillscummis.com)>; [klieb@sillscummis.com](mailto:klieb@sillscummis.com) <[klieb@sillscummis.com](mailto:klieb@sillscummis.com)>; \_cg J&J-SaveOn <[JJSaveOn@pbwt.com](mailto:JJSaveOn@pbwt.com)>

**Cc:** Philippe Selendy <[pselendy@selendygay.com](mailto:pselendy@selendygay.com)>; Andrew Dunlap <[adunlap@selendygay.com](mailto:adunlap@selendygay.com)>; Meredith Nelson <[mnelson@selendygay.com](mailto:mnelson@selendygay.com)>; Elizabeth Snow <[esnow@selendygay.com](mailto:esnow@selendygay.com)>; Wohlforth, E. Evans <[EWohlforth@rc.com](mailto:EWohlforth@rc.com)>; Galli, Sabrina M. <[SGalli@rc.com](mailto:SGalli@rc.com)>

**Subject:** RE: JJHCS v. SaveOnSP (Case No. 2:22-cv-02632-JKS-CLW)

**External: Think before you click.**

George,

SaveOn is not "under a court order to produce documents regarding its Adapt program." J&J moved to compel SaveOn to produce documents in response to Requests for Production Nos. 99, 102, and 103. J&J proposed three specific search terms to capture documents responsive to those requests. J&J relied in its motion on the "small number of relevant documents" that those three terms identified. See, e.g., Mot. at 2 ("JJHCS's proposed search terms yielded fewer than 5,600 documents for SaveOnSP to review"); Mot. at 7 ("Given the scale of this litigation, the damages at issue, and the already-vast scope of discovery, reviewing 5,551 additional documents would not be burdensome or disproportionate to the needs of the case"); Mot. at 9 ("JJHCS is entitled to discovery of these documents, especially given the small number involved (fewer than 5,600)"). In granting J&J's motion, Judge Wolfson wrote: "Because 5,000 is not a prohibitive number of documents and because the documents requested are relevant, Defendant is directed to produce relevant non-privileged documents requested in RFPs 99, 102 and 103," Order at 6; she added in a footnote: "Because the documents responsive to RFPs 99, 102 and 103 have been identified by Defendants, I need not address the appropriate search terms for these requests."

We disagree with your assertion that Judge Wolfson compelled SaveOn to run an additional search term when she stated: "the mere volume of production does not undermine the fact that these requests seek to search for documents that are tailored to the change in Defendant's communications and policy regarding high deductible copay insurance, or the so-called Adapt program." In this passage, Judge Wolfson simply stated that the three search terms at issue were tailored to these topics; she did not compel SaveOn to add additional terms.

If J&J wanted to include its new "Adapt" search term in its motion, it could have proposed the term to SaveOn in advance of filing so that SaveOn could have quantified the burden associated with J&J's request and presented argument about that term to the Court. We decline to run J&J's proposed additional term at this time.

SaveOn is reviewing documents responsive to the three search terms covered by the Special Master's order and will produce those documents by April 30, 2024 as the order requires. If after reviewing those documents, J&J believes that there is a gap in SaveOn's production, we would be glad to meet and confer.

Thank you,  
Matt

**Matthew Nussbaum**

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Selendy Gay PLLC [\[Web\]](#)

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---

**From:** LoBiondo, George (x2008) <[globiondo@pbwt.com](mailto:globiondo@pbwt.com)>

**Sent:** Thursday, April 25, 2024 9:13 AM

**To:** Meredith Nelson <[mnelson@selendygay.com](mailto:mnelson@selendygay.com)>; Long, Julia (x2878) <[jlong@pbwt.com](mailto:jlong@pbwt.com)>; Hannah Miles <[hmiles@selendygay.com](mailto:hmiles@selendygay.com)>; Mangi, Adeel A. (x2563) <[aamangi@pbwt.com](mailto:aamangi@pbwt.com)>; Sandick, Harry (x2723) <[hsandick@pbwt.com](mailto:hsandick@pbwt.com)>; Arrow, Sara (x2031) <[sarrow@pbwt.com](mailto:sarrow@pbwt.com)>; [jgreenbaum@sillscummis.com](mailto:jgreenbaum@sillscummis.com) <[jgreenbaum@sillscummis.com](mailto:jgreenbaum@sillscummis.com)>; [klieb@sillscummis.com](mailto:klieb@sillscummis.com) <[klieb@sillscummis.com](mailto:klieb@sillscummis.com)>; \_cg J&J-SaveOn <[JJSaveOn@pbwt.com](mailto:JJSaveOn@pbwt.com)>

**Cc:** Philippe Selendy <[pselendy@selendygay.com](mailto:pselendy@selendygay.com)>; Andrew Dunlap <[adunlap@selendygay.com](mailto:adunlap@selendygay.com)>; Elizabeth Snow <[esnow@selendygay.com](mailto:esnow@selendygay.com)>

**Subject:** RE: JJHCS v. SaveOnSP (Case No. 2:22-cv-02632-JKS-CLW)

Meredith,

I am following up a final time regarding SaveOnSP's obligation to produce documents regarding its Adapt program. We do not understand the basis for SaveOnSP's continued delay, and we regard this stonewalling as a violation of Judge Wolfson's clear order.

If we do not receive SaveOnSP's response by tomorrow, we will seek the Court's intervention.

Thanks very much.  
George

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**From:** LoBiondo, George (x2008)

**Sent:** Monday, April 22, 2024 10:13 AM

**To:** 'Meredith Nelson' <[mnelson@selendygay.com](mailto:mnelson@selendygay.com)>; Long, Julia (x2878) <[jlong@pbwt.com](mailto:jlong@pbwt.com)>; Hannah Miles <[hmiles@selendygay.com](mailto:hmiles@selendygay.com)>; Mangi, Adeel A. (x2563) <[aamangi@pbwt.com](mailto:aamangi@pbwt.com)>; Sandick, Harry (x2723) <[hsandick@pbwt.com](mailto:hsandick@pbwt.com)>; Arrow, Sara (x2031) <[sarrow@pbwt.com](mailto:sarrow@pbwt.com)>; [jgreenbaum@sillscummis.com](mailto:jgreenbaum@sillscummis.com) <[jgreenbaum@sillscummis.com](mailto:jgreenbaum@sillscummis.com)>; [klieb@sillscummis.com](mailto:klieb@sillscummis.com) <[klieb@sillscummis.com](mailto:klieb@sillscummis.com)>; \_cg J&J-SaveOn <[JJSaveOn@pbwt.com](mailto:JJSaveOn@pbwt.com)>

**Cc:** Philippe Selendy <[pselendy@selendygay.com](mailto:pselendy@selendygay.com)>; Andrew Dunlap <[adunlap@selendygay.com](mailto:adunlap@selendygay.com)>; Elizabeth Snow <[esnow@selendygay.com](mailto:esnow@selendygay.com)>

**Subject:** RE: JJHCS v. SaveOnSP (Case No. 2:22-cv-02632-JKS-CLW)

Meredith,

We still have not heard from you regarding our proposed Adapt search term. As you know, SaveOnSP is under a court order to produce documents regarding its Adapt program. When can we expect SaveOnSP's response?

Thanks,  
George

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**From:** Meredith Nelson <[mnelson@selendygay.com](mailto:mnelson@selendygay.com)>

**Sent:** Tuesday, April 16, 2024 4:56 PM

**To:** Long, Julia (x2878) <[jlong@pbwt.com](mailto:jlong@pbwt.com)>; Hannah Miles <[hmiles@selendygay.com](mailto:hmiles@selendygay.com)>; Mangi, Adeel A. (x2563) <[aamangi@pbwt.com](mailto:aamangi@pbwt.com)>; Sandick, Harry (x2723) <[hsandick@pbwt.com](mailto:hsandick@pbwt.com)>; LoBiondo, George (x2008) <[globiondo@pbwt.com](mailto:globiondo@pbwt.com)>; Arrow, Sara (x2031) <[sarrow@pbwt.com](mailto:sarrow@pbwt.com)>; [jgreenbaum@sillscummis.com](mailto:jgreenbaum@sillscummis.com) <[jgreenbaum@sillscummis.com](mailto:jgreenbaum@sillscummis.com)>; [klieb@sillscummis.com](mailto:klieb@sillscummis.com) <[klieb@sillscummis.com](mailto:klieb@sillscummis.com)>; \_cg J&J-SaveOn <[JJSaveOn@pbwt.com](mailto:JJSaveOn@pbwt.com)>

**Cc:** Philippe Selendy <[pselendy@selendygay.com](mailto:pselendy@selendygay.com)>; Andrew Dunlap <[adunlap@selendygay.com](mailto:adunlap@selendygay.com)>; Elizabeth Snow

<esnow@selendygay.com>

**Subject:** RE: JJHCS v. SaveOnSP (Case No. 2:22-cv-02632-JKS-CLW)

**External: Think before you click.**

Julia,

The first time that you proposed a specific search term for “Adapt” was in your letter of April 12. While you now ask that the parties meet and confer about this term today, in your April 12 letter you asked us to respond by April 19. We are running the term that you proposed and will respond once we have the results and consult with our client.

On your unrelated request that SaveOn run an additional search term over Darcie Falsioni’s documents, we decline to do so. The proposed term is overbroad and not designed to pick up responsive documents. If J&J wishes to propose an additional term tailored to the issues in this case, we will consider it, but we believe that the other nine search terms that we have agreed to run over Ms. Falsioni’s documents are more than sufficient.

Regards,

Meredith

**Meredith Nelson**

Associate [\[Email\]](#)

Selendy Gay PLLC [\[Web\]](#)

Pronouns: she, her, hers

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**From:** Long, Julia (x2878) <[jlong@pbwt.com](mailto:jlong@pbwt.com)>

**Sent:** Tuesday, April 16, 2024 1:07 PM

**To:** Meredith Nelson <[mnelson@selendygay.com](mailto:mnelson@selendygay.com)>; Hannah Miles <[hmiles@selendygay.com](mailto:hmiles@selendygay.com)>; Mangi, Adeel A. (x2563) <[aamangi@pbwt.com](mailto:aamangi@pbwt.com)>; Sandick, Harry (x2723) <[hsandick@pbwt.com](mailto:hsandick@pbwt.com)>; LoBiondo, George (x2008) <[globiondo@pbwt.com](mailto:globiondo@pbwt.com)>; Arrow, Sara (x2031) <[sarrow@pbwt.com](mailto:sarrow@pbwt.com)>; [jgreenbaum@sillscummis.com](mailto:jgreenbaum@sillscummis.com) <[jgreenbaum@sillscummis.com](mailto:jgreenbaum@sillscummis.com)>; [klieb@sillscummis.com](mailto:klieb@sillscummis.com) <[klieb@sillscummis.com](mailto:klieb@sillscummis.com)>; [\\_cg J&J-SaveOn@pbwt.com](mailto:_cg J&J-SaveOn@pbwt.com) <[\\_cg J&J-SaveOn@pbwt.com](mailto:_cg J&J-SaveOn@pbwt.com)>

**Cc:** Philippe Selendy <[pselendy@selendygay.com](mailto:pselendy@selendygay.com)>; Andrew Dunlap <[adunlap@selendygay.com](mailto:adunlap@selendygay.com)>; Elizabeth Snow <[esnow@selendygay.com](mailto:esnow@selendygay.com)>

**Subject:** RE: JJHCS v. SaveOnSP (Case No. 2:22-cv-02632-JKS-CLW)

Meredith,

To be clear, we repeatedly provided our availability to meet and confer last week and yesterday on the issue of both JJHCS’s and SaveOnSP’s discovery obligations. To that end, we promptly reviewed and assessed the burden in the term that you proposed yesterday with respect to Ms. Chapman’s and Ms. Wortman’s custodial files, and agree to run that term. This satisfies JJHCS’s obligations with respect to the search terms in Judge Wolfson’s order. But if you would like to meet and confer, let us know, and we will provide our availability for a third time.

We also do not think it is constructive for you to purportedly “correct the record” with information that is demonstrably false. For example, on the RFPs, you accuse us of making a new request “that J&J did not include in its motion to

compel.” That is wrong. In fact, the terms that we asked you to evaluate on Friday were expressly part of JJHCS’s motion to compel. See Mar. 6, 2024 Motion at 4 n.4. Judge Wolfson granted that motion, and specifically addressed the Adapt search term request. Apr. 10, 2024 Order at 6 (“[T]he mere volume of production does not undermine the fact that these requests seek to search for documents that are tailored to the change in Defendant’s communications and policy regarding high deductible copay insurance, **or the so-called Adapt program.**” (emphasis added)). My letter on Friday clearly addressed both this issue and JJHCS’s search terms (above), and made clear that we sought to meet and confer on both issues yesterday.

Finally, we have now asked four times to meet and confer on the remaining Falsioni search term. You have known the burden with respect to that term for more than a month. Last week, in a gesture of good faith, we asked if you had reconsidered SaveOnSP’s position in light of Judge Wolfson’s rulings (because we think it would be absurd for SaveOnSP to force yet more motion practice on such a small universe of documents). It simply is not credible to suggest that SaveOnSP needs a week to contemplate whether or not it will review 1,700 additional documents, and we object to SaveOnSP continuing to manufacture delay on this simple question. In any event, it is now “early this week,” and so we expect your response today. We understand you have availability at 4:00 p.m. today to meet and confer. Please come prepared to discuss this issue and the Adapt search term noted above.

Best,  
Julia

**Julia Long**  
She | Her | Hers  
Associate

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New York, NY 10036

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[jlong@pbwt.com](mailto:jlong@pbwt.com)

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**From:** Meredith Nelson <[mnelson@selendygay.com](mailto:mnelson@selendygay.com)>

**Sent:** Monday, April 15, 2024 9:31 PM

**To:** Long, Julia (x2878) <[jlong@pbwt.com](mailto:jlong@pbwt.com)>; Hannah Miles <[hmiles@selendygay.com](mailto:hmiles@selendygay.com)>; Mangi, Adeel A. (x2563) <[aamangi@pbwt.com](mailto:aamangi@pbwt.com)>; Sandick, Harry (x2723) <[hsandick@pbwt.com](mailto:hsandick@pbwt.com)>; LoBiondo, George (x2008) <[globiondo@pbwt.com](mailto:globiondo@pbwt.com)>; Arrow, Sara (x2031) <[sarrow@pbwt.com](mailto:sarrow@pbwt.com)>; ~jgreenbaum@sillscummis.com <[jgreenbaum@sillscummis.com](mailto:jgreenbaum@sillscummis.com)>; ~klieb@sillscummis.com <[klieb@sillscummis.com](mailto:klieb@sillscummis.com)>; \_cg J&J-SaveOn <[JJSaveOn@pbwt.com](mailto:JJSaveOn@pbwt.com)>

**Cc:** Philippe Selendy <[pselendy@selendygay.com](mailto:pselendy@selendygay.com)>; Andrew Dunlap <[adunlap@selendygay.com](mailto:adunlap@selendygay.com)>; Elizabeth Snow <[esnow@selendygay.com](mailto:esnow@selendygay.com)>

**Subject:** RE: JJHCS v. SaveOnSP (Case No. 2:22-cv-02632-JKS-CLW)

**External: Think before you click.**

Julia,

As you know, SaveOn is not independently “insisting” that J&J meet and confer about search terms for SaveOn’s requests. The parties were ordered by Judge Wolfson to meet and confer on these issues by April 17. SaveOn is complying with that order.



To correct the record on J&J's other requests, we gave you our position regarding the search term you asked us to run over Ms. Falsioni's documents on March 8, 2024. Last Wednesday, your colleague reached out to us to see if we would reconsider our position in light of the Court's rulings at the April 3 conference. We told him on Thursday that we would provide our position by early this week, and we will. On RFPs Nos. 99, 102, and 103, you sent us a letter on Friday night at 6:20pm asking for the first time that we run an additional term that J&J did not include in its motion to compel. You did not ask us to meet and confer about this request; you simply requested a response by April 19. Your suggestion that SaveOn has been dilatory in responding to either of these requests, or that we have ignored your requests to meet and confer, is demonstrably false.

Regards,

Meredith

**Meredith Nelson**

Associate [\[Email\]](#)

Selendy Gay PLLC [\[Web\]](#)

Pronouns: she, her, hers

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**From:** Long, Julia (x2878) <[jlong@pbwt.com](mailto:jlong@pbwt.com)>

**Sent:** Monday, April 15, 2024 5:20 PM

**To:** Meredith Nelson <[mnelson@selendygay.com](mailto:mnelson@selendygay.com)>; Hannah Miles <[hmiles@selendygay.com](mailto:hmiles@selendygay.com)>; Mangi, Adeel A. (x2563) <[aamangi@pbwt.com](mailto:aamangi@pbwt.com)>; Sandick, Harry (x2723) <[hsandick@pbwt.com](mailto:hsandick@pbwt.com)>; LoBiondo, George (x2008) <[globiondo@pbwt.com](mailto:globiondo@pbwt.com)>; Arrow, Sara (x2031) <[sarrow@pbwt.com](mailto:sarrow@pbwt.com)>; ~jgreenbaum@sillscummis.com <[jgreenbaum@sillscummis.com](mailto:jgreenbaum@sillscummis.com)>; ~klieb@sillscummis.com <[klieb@sillscummis.com](mailto:klieb@sillscummis.com)>; \_cg J&J-SaveOn <[JJSaveOn@pbwt.com](mailto:JJSaveOn@pbwt.com)>

**Cc:** Philippe Selendy <[pselendy@selendygay.com](mailto:pselendy@selendygay.com)>; Andrew Dunlap <[adunlap@selendygay.com](mailto:adunlap@selendygay.com)>; Elizabeth Snow <[esnow@selendygay.com](mailto:esnow@selendygay.com)>

**Subject:** RE: JJHCS v. SaveOnSP (Case No. 2:22-cv-02632-JKS-CLW)

Meredith,

Thanks for your letter. We are evaluating the burden associated with your counter-proposal on the search term for Ms. Chapman and Ms. Wortman's custodial files.

We note that we now have asked you to meet and confer on two issues related to SaveOnSP's proposed productions and have yet to receive a response: search terms related to RFP Nos. 99, 102, and 103; and whether SaveOnSP intends to run a single term over Ms. Falsioni's custodial documents, which you have been considering for more than a month. You have not responded to either request. If you do not respond by Wednesday April 17 on Ms. Falsioni's search term and by Friday, April 19 on the search terms related to RFP Nos. 99, 102, and 103, it is because impasse exists, and we will proceed to motion practice. Discovery is a two-way street, and it is inappropriate for SaveOnSP to ignore our requests to meet and confer about its production while insisting that JJHCS meet and confer about JJHCS's production.

Please respond without further delay.

Best,

Julia

**Julia Long**



She | Her | Hers  
Associate

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**From:** Meredith Nelson <[mnelson@selendygay.com](mailto:mnelson@selendygay.com)>  
**Sent:** Monday, April 15, 2024 12:46 PM  
**To:** Long, Julia (x2878) <[jlong@pbwt.com](mailto:jlong@pbwt.com)>; Hannah Miles <[hmiles@selendygay.com](mailto:hmiles@selendygay.com)>; Mangi, Adeel A. (x2563) <[aamangi@pbwt.com](mailto:aamangi@pbwt.com)>; Sandick, Harry (x2723) <[hsandick@pbwt.com](mailto:hsandick@pbwt.com)>; LoBiondo, George (x2008) <[globiondo@pbwt.com](mailto:globiondo@pbwt.com)>; Arrow, Sara (x2031) <[sarrow@pbwt.com](mailto:sarrow@pbwt.com)>; [jgreenbaum@sillscummis.com](mailto:jgreenbaum@sillscummis.com) <[jgreenbaum@sillscummis.com](mailto:jgreenbaum@sillscummis.com)>; [klieb@sillscummis.com](mailto:klieb@sillscummis.com) <[klieb@sillscummis.com](mailto:klieb@sillscummis.com)>; \_cg J&J-SaveOn <[JJSaveOn@pbwt.com](mailto:JJSaveOn@pbwt.com)>  
**Cc:** Philippe Selendy <[pselendy@selendygay.com](mailto:pselendy@selendygay.com)>; Andrew Dunlap <[adunlap@selendygay.com](mailto:adunlap@selendygay.com)>; Elizabeth Snow <[esnow@selendygay.com](mailto:esnow@selendygay.com)>  
**Subject:** RE: JJHCS v. SaveOnSP (Case No. 2:22-cv-02632-JKS-CLW)

**External: Think before you click.**

Julia,

Please see the attached letter. We are not available today from 2-3:30, but we can be available to meet and confer tomorrow between 11 and 1:30 and after 4 if J&J believes it would be helpful to discuss any of the points in this letter.

Regards,

Meredith

**Meredith Nelson**  
Associate [\[Email\]](#)  
Selendy Gay PLLC [\[Web\]](#)  
Pronouns: she, her, hers

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**From:** Long, Julia (x2878) <[jlong@pbwt.com](mailto:jlong@pbwt.com)>  
**Sent:** Friday, April 12, 2024 6:22 PM  
**To:** Hannah Miles <[hmiles@selendygay.com](mailto:hmiles@selendygay.com)>; Mangi, Adeel A. (x2563) <[aamangi@pbwt.com](mailto:aamangi@pbwt.com)>; Sandick, Harry (x2723) <[hsandick@pbwt.com](mailto:hsandick@pbwt.com)>; LoBiondo, George (x2008) <[globiondo@pbwt.com](mailto:globiondo@pbwt.com)>; Arrow, Sara (x2031) <[sarrow@pbwt.com](mailto:sarrow@pbwt.com)>; [jgreenbaum@sillscummis.com](mailto:jgreenbaum@sillscummis.com) <[jgreenbaum@sillscummis.com](mailto:jgreenbaum@sillscummis.com)>; [klieb@sillscummis.com](mailto:klieb@sillscummis.com) <[klieb@sillscummis.com](mailto:klieb@sillscummis.com)>; \_cg J&J-SaveOn <[JJSaveOn@pbwt.com](mailto:JJSaveOn@pbwt.com)>  
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**Subject:** RE: JJHCS v. SaveOnSP (Case No. 2:22-cv-02632-JKS-CLW)

Hannah,

Please see the attached correspondence. We are available to meet and confer on Monday, April 15 between 2:00 p.m. and 3:30 p.m. Please let us know if sometime during that window works for your team.

Best,  
Julia

**Julia Long**  
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**From:** Hannah Miles <[hmiles@selendygay.com](mailto:hmiles@selendygay.com)>

**Sent:** Friday, April 12, 2024 12:21 PM

**To:** Long, Julia (x2878) <[jlong@pbwt.com](mailto:jlong@pbwt.com)>; Mangi, Adeel A. (x2563) <[aamangi@pbwt.com](mailto:aamangi@pbwt.com)>; Sandick, Harry (x2723) <[hsandick@pbwt.com](mailto:hsandick@pbwt.com)>; LoBiondo, George (x2008) <[globiondo@pbwt.com](mailto:globiondo@pbwt.com)>; Arrow, Sara (x2031) <[sarrow@pbwt.com](mailto:sarrow@pbwt.com)>; ~jgreenbaum@sillscummis.com <[jgreenbaum@sillscummis.com](mailto:jgreenbaum@sillscummis.com)>; ~klieb@sillscummis.com <[klieb@sillscummis.com](mailto:klieb@sillscummis.com)>; \_cg J&J-SaveOn <[JJSaveOn@pbwt.com](mailto:JJSaveOn@pbwt.com)>

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**Subject:** RE: JJHCS v. SaveOnSP (Case No. 2:22-cv-02632-JKS-CLW)

**External: Think before you click.**

Counsel,

As you are aware, Judge Wolfson's order from earlier this week directed the parties to meet and confer on several of the outstanding issues addressed in our letter by next Wednesday, April 17. We sent you the attached letter on Monday. Please let us know when we should expect your response and when you can meet and confer, so that the parties can either resolve these disputes or submit them to Judge Wolfson for prompt resolution.

Best,  
Hannah

**Hannah Miles**  
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**From:** Hannah Miles

**Sent:** Monday, April 8, 2024 6:44 PM

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**Cc:** Philippe Selendy <[pselendy@selendygay.com](mailto:pselendy@selendygay.com)>; Andrew Dunlap <[adunlap@selendygay.com](mailto:adunlap@selendygay.com)>; Meredith Nelson <[mnelson@selendygay.com](mailto:mnelson@selendygay.com)>; Elizabeth Snow <[esnow@selendygay.com](mailto:esnow@selendygay.com)>

**Subject:** JJHCS v. SaveOnSP (Case No. 2:22-cv-02632-JKS-CLW)

Counsel,

Please see the attached correspondence.

Best,  
Hannah

**Hannah Miles**

Associate [\[Email\]](#)

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